

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JOSHUA SCHMITT, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CHINA XD PLASTICS COMPANY,
LIMITED, FAITH DAWN LIMITED,
FAITH HORIZON, INC., XD
ENGINEERING PLASTICS COMPANY
LIMITED, JIE HAN, TAYLOR ZHANG,
LINYUAN ZHAI, HUIYI CHEN and
GUANBAO HUANG,

Defendants.

Case No.: 1:20-cv-06028-NGG-SJB

**NOTICE OF CAMPBELL &
WILLIAMS' MOTION TO WITHDRAW
AS COUNSEL OF RECORD**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Campbell & Williams will and does hereby move this Court, pursuant to N.Y. Rules of Prof'l Conduct 1.16(c) and Local Rule 1.4, for an order permitting the firm to withdraw as counsel of record for Defendants Jie Han, XD Engineering Plastics Company Limited, Faith Horizon, Inc. and Faith Dawn Limited.

In support of this Motion, Movant submits a Memorandum in Support, Declaration, and [Proposed] Order granting Movant's Motion.

Dated: July 16, 2021

Respectfully submitted,

CAMPBELL & WILLIAMS

By: /s/ J. Colby Williams

J. Colby Williams, Esq. (*pro hac vice*)

710 South Seventh Street

Las Vegas, Nevada 89101

Tel: (702) 382-5222

Fax: (702) 382-0540

Email: jcw@cwlawlv.com

*Attorneys for Defendants Jie Han, XD Engineering
Plastics Company Limited, Faith Horizon, Inc.,
and Faith Dawn Limited*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 16, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send Notice of Electronic Filing to all CM/ECF participants.

I further certify that I mailed the foregoing document and the notice of electronic filing via U.S. first-class mail and international courier (FedEx) to the following:

Faith Horizon, Inc.
c/o Legalinc Corporate Services, Inc.
1810 East Sahara Avenue, Suite 215
Las Vegas, Nevada 89104

Jie Han
200 Park Avenue, Suite 1700
New York, NY 10166

Jie Han
No. 9 Dalian North Road
Haping Road Centralized Industrial Park
Harbin Development Zone
Heilongjiang Province, P.R. China

Faith Dawn Limited
XD Engineering Plastics Company
c/o Jie Han
No. 9 Dalian North Road
Haping Road Centralized Industrial Park
Harbin Development Zone
Heilongjiang Province, P.R. China

/s/ John Y. Chong
An employee of Campbell & Williams

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